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Attorneys for Plaintiffs

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

ARMANDO VILLANUEVA and
HORTENCIA SAINZ, individually and
as successor in interest to Pedro
Villanueva, deceased, and FRANCISCO
OROZCO, individually,

Plaintiffs,

vs.

STATE OF CALIFORNIA; JOHN
CLEVELAND; RICH HENDERSON,

Defendants.

Case No. 8:17-cv-01302-JLS-KESx

[Hon. Josephine L. Staton]

**NOTICE OF CONDITIONAL
SETTLEMENT AND REQUEST TO
VACATE ALL DATES**

*[Proposed Order filed concurrently
herewith]*

COME NOW Plaintiffs FRANCISCO OROZCO, HORTENCIA SAINZ, ARMANDO VILLANUEVA and Defendants STATE OF CALIFORNIA; JOHN CLEVELAND; RICH HENDERSON, by and through their counsel of record (“the Parties”) and hereby notify this Honorable Court as follows:

1. The Parties have participated in a mediation with Honorable Joseph Hilberman and have reached a conditional settlement of this entire case for a specified amount.
2. The settlement will be recommended to and must be approved by the appropriate authorities.
3. The parties jointly stipulate and request that the Court vacate all pending dates, including all pretrial filing deadlines and the trial date.
4. The parties further request that this Court retain jurisdiction over this matter to enforce the terms of the settlement.

DATED: September 1, 2021

LAW OFFICES OF DALE K. GALIPO

Bv: /s/ Dale K. Galipo

Dale K. Galipo
Renee V. Masongsong
Attorneys for Plaintiff *Francisco Orozco*

DATED: September 1, 2021

KIESEL LAW LLP

Bv: /s/ D. Bryan Garcia

Paul Kiesel
D. Bryan Garcia
Ashley Conlogue
Attorneys for Plaintiffs,
Armando Villanueva and Hortencia Sainz

1 DATED: September 1, 2021

ROB BONTA
Attorney General of California

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3 Bv: /s/ Donna M. Dean
4 DONNA M. DEAN
5 Deputy Attorney General
6 Attorneys for Defendants
7 State of California, Jon Cleveland,
8 and Richard Henderson
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